



U.S. Department of Justice

*United States Attorney
Southern District of New York*

Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

June 26, 2025

BY CM/ECF

The Honorable Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Keonne Rodriguez and William Lonergan Hill,*
S3 24 Cr. 82 (RMB)**

Dear Judge Berman:

The Government respectfully writes regarding the S3 Superseding Indictment (the “Indictment”), which a grand jury sitting in this District returned on June 24. (Dkt. 109). The Government respectfully requests that the Court arraign the defendants on the Indictment at the next scheduled conference at which the defendants are present.

As for the substance of the Indictment, the Indictment does not add any additional counts to the previously returned indictments or any additional objects to the previously charged conspiracies. Nor is the Government in possession of additional discovery relating to the Indictment. Rather, the main changes in the Indictment are as follows:

- extending the period of the charged conspiracies until the dates of the defendants’ arrests in April 2024;
- removing from Count Two one of the two objects of the conspiracy, namely, the failure to register object, in violation of 18 U.S.C. § 1960(b)(1)(B);
- adding as an underlying specified unlawful activity to Count One conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. §§ 846 and 841;
- modifying certain statutory language in Count One to rely solely on the definition of “financial transaction” in 18 U.S.C. § 1956(c)(4)(A) (and not (c)(4)(B)); and
- adding additional factual allegations summarizing evidence obtained during the Government’s investigation, including following the defendants’ arrests.

While the Court has already excluded time under the Speedy Trial Act with respect to the prior indictment until July 16, 2025 (Dkt. 77), the Government respectfully requests that the Court specifically exclude time under the Speedy Trial Act in light of the return of the new operative

Indictment. The Government respectfully requests that time be excluded until July 16, 2025 pursuant to 18 U.S.C. § 3161(h)(7)(A), and respectfully submits that the ends of justice served by taking such action outweigh the best interest of the public and the defendants in a speedy trial because the time will allow for the defendants to continue to review discovery, prepare their remaining pretrial motions, and prepare for trial. Counsel to the defendants consents to the exclusion of time.

Applications granted. Time is excluded
pursuant to the Speedy Trial Act for the
reasons set forth in this letter.

SO ORDERED:

Date: 6/26/25

Richard M. Berman
Richard M. Berman, U.S.D.J.

Respectfully submitted,

NICOLAS ROOS

Acting Deputy United States Attorney,
Attorney for the United States,
Acting Under Authority Conferred by
28 U.S.C. § 515

By: /s/ _____

Andrew K. Chan

David R. Felton

Cecilia Vogel

Assistant United States Attorneys

Tel: (212) 637-1072 / 2299 / 1084

cc: All Counsel of Record